

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WESTFIELD EAST MAIN STREET LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. 04-30170-MAP
)	
C. DAVID TRADER, JEAN M. TRADER,)	
DONALD GOVE, MICHAEL BRETON,)	
BRADFORD MOIR, MARY MOIR,)	
INTERSTATE BUILDING SUPPLY, INC. and)	
LUMBER CENTER, INC.,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND DISCOVERY

The plaintiffs, Westfield East Main Street LLC (“Westfield”), and defendants, C. David Trader, Jean M. Trader, Donald Gove, Michael Breton, Bradford Moir, Mary Moir, Interstate Building Supply, Inc., and Lumber Center, Inc. (collectively, the “Defendants” and together with Westfield, the “Parties”) request that the Court extend the time in which the Parties have to complete discovery in this action. In support of this Motion, the parties state:

1. The fact discovery deadline is June 15, 2005. The deadline for the Parties to designate an expert, if necessary, is July 1, 2005.
2. The pre-trial conference is scheduled for September 1, 2005.
3. The trial is scheduled for November 1, 2005.
4. The parties request an extension until August 1, 2005 to complete fact discovery and until August 31, 2005 to designate experts. This is the first extension of the discovery

deadlines requested by either party, and its allowance will facilitate the orderly completion of discovery.

5. The Court's allowance of this Joint Motion to Extend Discovery will not delay the pre-trial conference or the trial and thus will not cause any party undue prejudice, delay or expense.

WHEREFORE, the Parties respectfully request that the Court grant the Joint Motion to Extend Discovery as follows:

- a. The deadline for all fact discovery be extended from June 15, 2005 to August 1, 2005; and
- b. The deadline for the Parties to designate an expert be extended from July 1, 2005 to August 31, 2005.

WESTFIELD EAST MAIN STREET LLC
By its attorneys,

/s/ Pamela A. Zorn
David A. Brown, BBO# 556161
Pamela A. Zorn, BBO# 640800
Sherin and Lodgen LLP
101 Federal Street
Boston, Massachusetts 02110
(617) 646-2000

C. DAVID TRADER, JEAN M. TRADER,
DONALD GOVE, MICHAEL BRETON,
BRADFORD MOIR, MARY MOIR,
INTERSTATE BUILDING SUPPLY, INC.
and LUMBER CENTER, INC.,
By their attorney,

/s/ William Pudlo
William Pudlo, BBO# 407640
Box 676
7 Park Drive
West Springfield, Massachusetts 01090

Dated: June 1, 2005